

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)	
)
Plaintiff,)	
)	
vs.)	
)	
GBMC HEALTHCARE, INC. et al.,)	
)	
Defendants.)	
)	

CASE NO. 1:24-cv-02803-JKB

THE EEOC'S SUPPLEMENT TO MOTION TO EXTEND ALL DEADLINES AND FOR A STAY DUE TO GOVERNMENT SHUTDOWN (DOCKET ENTRY 42)

1. On October 1, 2025, the EEOC filed The EEOC's Motion to Extend All Deadlines and For a Stay Due to Government Shutdown at Doc. 42. As stated in the Motion, the EEOC conferred with Defendants about the relief sought in the Motion and Defendants consented to that relief. ECF 42, ¶ 1.

2. After the EEOC filed the above-referenced Motion (ECF 42), Defendants sent the undersigned an email attaching a letter issued pursuant to Federal Rule of Civil Procedure 11(c)(2), accompanied by a nineteen (19) page motion, demanding that the EEOC "withdraw or appropriately amend the Complaint within 21 days of this letter to correct the factual misstatements and to dismiss any claims that lack evidentiary support or legal merit." The letter says that if the EEOC does not do so by October 22, 2025, then Defendants will file the motion with the Court seeking dismissal of the EEOC's Complaint as a Rule 11 sanction.

3. As stated previously, in the absence of an order granting the relief sought in Doc. 42, the EEOC is prepared to continue complying with the Court's Orders governing discovery so that Court-ordered deadlines are satisfied. To that end, the undersigned will travel to Florida in

the morning on October 2, 2025, to conduct the deposition of Cindi Beanland, the healthcare provider who provided information in documentation that Defendants asked the Charging Party to complete and return during the onboarding process.

4. Before doing so, however, the EEOC files this supplement to provide the above-described new information so that the record references currently scheduled and anticipated discovery matters and the Court is advised of them when considering the EEOC's Motion filed at Doc. 42 and the relief sought therein. Should the Court grant the EEOC's Motion, the EEOC respectfully requests that the relief granted extend to the above-described Rule 11 letter and Defendants' proposal to file a motion to dismiss the EEOC's Complaint or seek other sanctions against the agency on October 22, 2025.

Dated: October 2, 2025

Respectfully submitted:

/s/ Emily Datnoff
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Counsel for the EEOC

CERTIFICATE OF SERVICE

I hereby certify that October 2, 2025, a true and accurate copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ *Emily Datnoff*

Emily Datnoff

Trial Attorney

Counsel for the EEOC